



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**MEMORANDUM**

**July 11, 2000**

**SUBJECT:** Response to Public Comments on Notice of Availability of Reregistration Eligibility Document and Notice of Voluntary Cancellation of Sulfotepp

**FROM:** Robbi Farrell, Chemical Review Manager  
Special Review and Reregistration Division  
Office of Pesticide Programs

**TO:** OPP Public Docket for Sulfotepp  
Docket # 34146B

**Introduction**

This document addresses public comments that were received in response to EPA's Notice of Availability of Reregistration Eligibility Document and Notice of Voluntary Cancellation of Sulfotepp (64 FR 71754, December 22, 1999) for the organophosphate chemical sulfotepp. Comments were received from the Natural Resources Defense Council (NRDC). Their comments address four main concerns, which are summarized below and followed by EPA's responses.

1. **Comment:** The generous phase-out period will allow worker exposure for five more years.

**Response:** For occupational risks, the Agency is required under FIFRA to consider benefits as well as risks of a pesticide's use when determining eligibility for reregistration and making risk management decisions. The Agency recognizes that sulfotepp fills a specific market niche. Sulfotepp also plays a role in integrated pest management. The registrants agreed to significant exposure reduction measures by strengthening their labels to require more personal protection for handlers and by improving directions for use. In light of the benefits of sulfotepp to the industry, its low volume of use, and these exposure reduction measures, the Agency agreed to a five-year phase-out of sulfotepp production, distribution, and use. Conditions of the phase-out agreement included immediate amendment of end-use product labels to increase worker and bystander protection for the duration of the phase-out period, and an annual production cap through September 30,

2002. The five-year timeframe is intended to allow growers time to transition to alternatives to sulfotepp before it becomes unavailable.

2. **Comment:** The risk of secondary exposure of children and family members of commercial applicators to residues on hair, skin and clothing.

**Response:** The preliminary risk assessments represent the Agency's best current estimate of potential risks. A primary goal of the public participation process as initiated by the Tolerance Reassessment Advisory Committee (TRAC) is to solicit comments from knowledgeable and interested parties about our processes and procedures in order to improve, correct and refine the assessments. The Agency acknowledges that bystanders and the general public may experience secondary exposure to pesticide residues taken home by workers on contaminated clothing and by other inadvertent routes of exposure. The Agency is currently in the process of revising its guidance for completing residential and postapplication exposure assessments to address these issues.

3. **Comment:** The need to include sulfotepp in the cumulative risk assessment for organophosphates.

**Response:** Sulfotepp is a restricted-use pesticide, registered for use only on ornamentals by commercial applicators. Sulfotepp has no food uses and because its use is limited to greenhouses, it is not expected to reach drinking water supplies. Therefore, only occupational exposure to sulfotepp is expected to occur. Cumulative risk assessment considers dietary (food and drinking water), residential and other non-occupational exposure scenarios; it does *not* include occupational exposure. Therefore, risk from use of sulfotepp end use products will not be included in a cumulative risk assessment of the organophosphates. Risk from exposure to sulfotepp as a contaminant in other pesticides, however, may be included in a cumulative assessment, as discussed below.

4. **Comment:** The need to recognize the presence of sulfotepp as a contaminant in chlorpyrifos and diazinon, and to consider it in risk assessments of those chemicals.

**Response:** The Agency acknowledges that sulfotepp is a process-related impurity generated during the manufacture of diazinon and chlorpyrifos. Technical diazinon manufactured in the U.S. is stabilized to prevent conversion to sulfotepp, resulting in extremely low, or trace level sulfotepp concentrations. However, diazinon produced outside the U.S. contains higher concentrations, ranging up to 0.55%. The level of sulfotepp in chlorpyrifos is much lower than in diazinon, at <0.1%. The Agency has determined that even at the highest concentration, 0.55%, the presence of sulfotepp as an impurity is not of toxicological significance.